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6 Attorneys for Defendant
SONY COMPUTER ENTERTAINMENT AMERICA LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HENRY GARCIA, On Behalf of Himself,
All Others Similarly Situated and the
General Public,

Plaintiff,

V.

SONY COMPUTER
ENTERTAINMENT AMERICA LLC.

Defendant.

CASE NO. CV-11-2246 RS

**STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINE TO
RESPOND TO COMPLAINT AND
SCHEDULING BRIEFING AND HEARING
FOR MOTION TO DISMISS AND
MOTION TO STAY DISCOVERY**

Judge: Hon. Richard Seeborg
Dept: Courtroom 3

1 Counsel for defendant Sony Computer Entertainment America LLC (“SCEA”) and
 2 plaintiff Henry Garcia have conferred regarding SCEA’s intention to file a motion to dismiss and
 3 motion to stay discovery in response to the Complaint. Based in part on SCEA’s counsel’s
 4 absence due to vacation plans, Mr. Garcia’s counsel have agreed to extend SCEA’s deadline to
 5 respond to the Complaint, which is otherwise May 31, 2011. To increase efficiencies, the parties
 6 have also agreed to request that the Court consolidate the hearing regarding SCEA’s motions to
 7 dismiss and stay discovery with the Case Management Conference scheduled on August 25,
 8 2011.

9 Further, the parties have agreed to hold a Fed. R. Civ. P. 26 conference on June 29, 2011.

10 Based on the foregoing and pursuant to Local Rule 6-1 of the Northern District of
 11 California, the parties, by and through their attorneys of record, hereby stipulate and agree to
 12 extend SCEA’s deadline to respond to the Complaint and schedule the briefing and hearing of
 13 SCEA’s motions to dismiss and stay discovery as follows:

14 1. July 7, 2011 – SCEA’s last day to file its motion to dismiss and motion to stay
 15 discovery.

16 2. July 28, 2011 – Plaintiff’s last day to file his opposition to SCEA’s motion to
 17 dismiss and motion to stay discovery.

18 3. August 11, 2011 – SCEA’s last day to file reply briefs in support of its motion to
 19 dismiss and motion to stay discovery

20 4. August 25, 2011, 1:30 P.M. – Hearing regarding SCEA’s motion to dismiss and
 21 motion to stay discovery. The Case Management Conference scheduled on August 25, 2011 at
 22 10:00 A.M. will be continued to August 25, 2011 at 1:30 P.M., to take place with the hearing.

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The parties have not previously requested a modification of these dates or deadlines.

Dated: May 31, 2011

BLOOD HURST & O'REARDON, LLP

CASEY GERRY SCHENK FRANCAVILLA
BLATT & PENFIELD, LLP

DAVID LIZERBRAM & ASSOCIATES

By: /s/ Timothy Blood

Timothy G. Blood

Counsel for Plaintiff Henry Garcia

Dated: May 31, 2011

DLA PIPER LLP (US)

By: /s/ Carter Ott

LUANNE SACKS

CARTER OTT

*Counsel for Defendant Sony Computer
Entertainment America LLC*

I, Carter Ott, am the ECF user whose identification and password are being used to file the foregoing Stipulation And [Proposed] Order Continuing Deadline To Respond To Complaint And Scheduling Briefing And Hearing For Motion To Dismiss And Motion To Stay Discovery. I hereby attest that the above-referenced signatory to this stipulation has concurred in this filing.

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. SCEA shall file its motion to dismiss and motion to stay discovery on or before July 7, 2011.

2. Plaintiff shall file his opposition to SCEA's motion to dismiss and motion to stay discovery on or before July 28, 2011.

3 SCEA shall file any reply briefs in support of its motion to dismiss and motion to
stay discovery on or before August 11, 2011.

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1 4. The hearing regarding SCEA's motion to dismiss and motion to stay discovery
2 shall be on August 25, 2011, at 1:30 P.M.

3 5. The Case Management Conference scheduled on August 25, 2011 at 10:00 A.M. is
4 continued to August 25, 2011 at 1:30 P.M.

5 Dated: 6/1, 2011

6 By:



7 Honorable Richard Seeborg
8 United States District Court Judge

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